

Message

From: Koniki, Kishan V [Kishan.Koniki@bp.com]
Sent: 7/27/2017 9:41:53 PM
To: Cozzie, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ee8c3582a39d4d81ac38f29a2b3abb2d-DCOZZIE]; 'Tsirigotis.peter@Epa.gov'
CC: Caldwell, Shanda [Shanda.Caldwell@bp.com]
Subject: RE: Pneumatic Pump Inspections

Dear David/Peter,

We would like to discuss this requirement under the NSPS Subpart OOOOa rule on pneumatic pump Method 21 inspections. Can you let us know of a convenient time(s) that will work for you next week. I was thinking of a 45-min conference call between us. I would also like to invite permitting engineers from Wyoming Air Quality Division as we would like to share the current WY state BACT requirements that are applicable to these pneumatic pumps that are also covered under the NSPS OOOOa.

Sincerely,

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From: Wood, Dana A.
Sent: Friday, May 05, 2017 10:13 AM
To: Koniki, Kishan V; Caldwell, Shanda
Subject: FW: Pneumatic Pump Inspections

RYI

From: Wood, Dana A.
Sent: Thursday, April 27, 2017 12:59 PM
To: cozzie.david@epa.gov; 'Tsirigotis.peter@Epa.gov'
Subject: Pneumatic Pump Inspections

Dear Peter and David,

Currently under NSPS OOOOa, we are required to conduct an annual Method 21 leak monitoring of the closed vent system (CVS) from pneumatic pumps to the control device, although regulatory requirements are a bit unclear (see attached document with the pertinent regulatory text). Please note that we are also required to monitor the entire well location including the above mentioned CVS using an optical gas imagining (OGI) camera under the LDAR requirements of the rule. Under LDAR requirements the entire well locations will be inspected on a semi-annual frequency using an OGI camera.

We would like to request the use an OGI camera to conduct the CVS inspections as an alternative method to satisfy the inspection requirements of the CVS for the following reasons:

- Already monitoring the closed vent system with an OGI camera.
- It adds more expense to purchase and maintain a Method 21 required OVA or TVA monitor and associated training requirements for the person to do the monitoring.
- Method 21 monitoring does not work well under extreme cold temperatures which we face in the areas of Wyoming where the pneumatic pumps are installed for heat trace and when the pumps are in operation.
- The Method 21 does not do as well at detecting leaks from insulated pipes as OGI (the CVS piping is typically insulated)

Please let us know if we can get approval for using an OGI camera to monitor the closed vent system from the pneumatic pump to the control device or guidance that would allow for this.

Please do not hesitate to contact us if you need additional information on our request.

Sincerely,
Dana Wood

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